

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Criminal No. ¹~~X~~08-CR- 600(LEK)

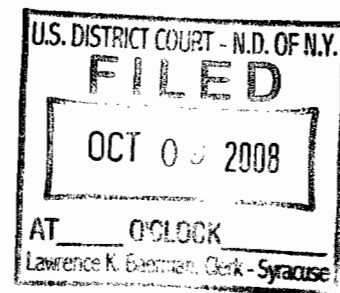
v.

INDICTMENT

CAROL A. BRUNO,

VIO: Title 29, U.S.C. § 501(c)
(Felony)

Defendant.



THE GRAND JURY CHARGES:

COUNT 1

1. That, at all times material to this Information the Civil Service Employees Association Region IV, ("CSEA Region IV") with an address of 1 Lear Jet Lane, Suite 2, Latham, New York 12110, was a labor organization engaged in an industry affecting commerce, within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code.

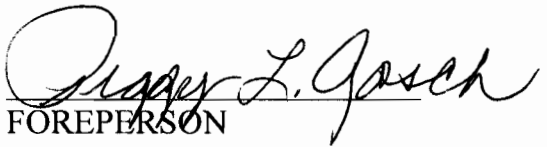
2. At all times material to this Indictment the defendant, **CAROL A. BRUNO**, was an officer, as that term is defined in Section 402(n) of Title 29, United States Code, that is, Treasurer of CSEA Region IV.

3. From on or about March 2004 through March 2006, in the Northern District of New York, **CAROL A. BRUNO** did embezzle, steal, and unlawfully and willfully abstract and convert to her own use the monies, funds, property, and other assets of CSEA Region

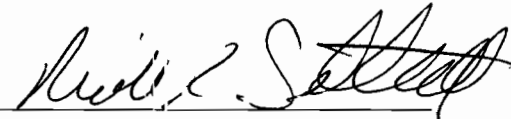
IV, in the approximate amount of \$16,118.57, in violation of Title 29, United States Code, Section 501(c).

Dated: October 9, 2008

A TRUE BILL,


FOREPERSON

ANDREW T. BAXTER
ACTING UNITED STATES ATTORNEY
NORTHERN DISTRICT OF NEW YORK

By: 
Richard R. Southwick
Assistant U.S. Attorney
Bar Roll #506265